

**From:** Priscilla Burton  
**To:** Wayne\_Ludington@blm.gov  
**Date:** 7/30/03 1:36PM  
**Subject:** Fwd: Wildcat Loadout Task #1381

Hello Wayne,  
I am forwarding this message to you as I incorrectly spelled your email address the first time.  
Priscilla.

>>> Priscilla Burton Wednesday, July 30, 2003 11:41:28 AM >>>  
Hello Wayne,

As per our telephone conversation today, I am attaching selected comments from the Division's recent Technical Analysis of the Wildcat stockpile area amendment (Task #1381). These selected comments concern the topsoil/subsoil salvage and location of the topsoil stockpile ;the seed mix used in interim and final reclamation and the reference area. (After a recent interagency meeting on coordination of permitting, I was made aware of the Division's obligation to consult with surface managing agency regarding such changes to the plan.) Please forward the information to the appropriate reviewer(s).

Sincerely,  
Priscilla

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## REVEGETATION

Regulatory Reference: 30 CFR Sec. 785.18, 817.111, 817.113, 817.114, 817.116; R645-301-244, -301-353, -301-354, -301-355, -301-356, -302-280, -302-281, -302-282, -302-283, -302-284.

### Analysis:

#### General Requirements

The Permittee must omit the following non-native species from the interim and final seed mixes: crested wheatgrass, Russian wildrye, forage kochia, alfalfa, and yellow sweetclover as well as reduce seed rate of whitestem rabbitbrush (R645-301-353.120).

The Division recommends a new interim seed mix with the following species:

- |                               |  |
|-------------------------------|--|
| • Indian ricegrass            | <i>Achnatherum hymenoides</i>                              |
| • Galleta                     | <i>Hilaria jamesii</i>                                     |
| • Needle and thread           | <i>Stipa comata</i>  |
| • Bottlebrush squirreltail    | <i>Elymus elymoides</i>                                    |
| • Thickspike wheatgrass       | <i>Elymus lanceolatus</i> ssp. <i>Psammophilus</i>         |
|                               |  |
| • Lewis flax                  | <i>Linum lewisii</i>                                       |
| • Gooseberry-leaf globemallow | <i>Sphaeralcea grossulariaefolia</i>                       |
| • Sagebrush                   | <i>Artemisia tridentata wyomingensis</i> var. Gordon Creek |
| • Winterfat                   | <i>Krascheninnikova lanata</i>                             |
| • Low rabbitbrush             | <i>Chrysothamnus viscidiflorus</i>                         |
| • Fourwing saltbrush          | <i>Atriplex canescens</i>                                  |

The Permittee must present the seed mix lists in table format, which include botanical and common names, pure live seed per foot, pure live seed per acre, total pure live seed per foot, total pure live seed per acre. Plan for the total pure live seed per square foot to be greater than or equal to 100 PLS/sq. ft. Currently, the table provide seed rates in pounds per acre. These values do not provide the Division with the necessary information to determine if the rates are adequate for stabilization.

#### Revegetation: Standards For Success

The expansion of the coal stockpile designated as West Ridge “A2, B” will bring the potential for the impact of wind borne coal fines at least 165 feet closer the vegetation reference area. The reference area is located approximately four hundred feet ESE of the proposed expansion and has already been impacted by fines from the current stockpile. The current and future coal fine-related impact to the reference area will most likely affect the revegetation success requirements. The degradation of the existing plants and change in plant composition is negatively affecting the success standard.

### Findings:

Information provided in the application is not considered adequate to meet the minimum Reclamation Vegetation Requirements of the Regulations. Prior to approval, the Permittee must act in accordance with the following:

**R645-302-263 and R645-301-353.120**, The Permittee must omit the following non-native species from the interim and final seed mixes: crested wheatgrass, Russian wildrye, forage kochia, alfalfa, and yellow sweetclover as well as reduce seed rate of whitestem rabbitbrush. The Permittee must present the seed mix lists in table format, which include botanical and common names, pure live seed per foot, pure live seed per acre, total pure live seed per foot, total pure live seed per acre.

**R645-302-263 and R645-301-356.100**, The permittee must relocate the vegetation reference area to an area that has not been or will not be impacted by fugitive coal fines.

## TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-230.

### Analysis:

#### Topsoil Removal and Storage

Topsoil handling is described in Chapter IV, Part F., Section 3. This application revises Chapter IV, Part A, Section 5.2 (page 62) to indicate that the area of expansion will be scraped to a depth of 2-6 inches from the site to remove the coal fines. The topsoil beneath the coal fines will be salvaged to a depth of 24 inches. The twenty-four inch salvage depth is based upon the consultant's recommendation that although the entire profile is suitable material for salvage, the top twenty-four inches has the better texture (loam) and higher nitrogen content than the subsoil

The Division agrees with the salvage of the top twenty-four inches of topsoil, but will require the remaining thirty inches of subsoil is salvaged and stockpiled separately for use as substitute topsoil during final reclamation (see discussion below under **topsoil substitutes and supplements**). In previous expansions, refuse was used as fill to create a foundation for the stockpile. Information on the foundation to be constructed for this expansion is requested under Spoil and Waste Materials.

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The existing stockpiles are located on the west, south and north perimeters of the disturbed area. The prevailing winds are from west to east. Topsoil piles E and B are upwind of

the site. Topsoil Pile A is immediately adjacent to the proposed expansion area and would be affected by fugitive dust from the coal stockpile located on the northwest of the pile.

To avoid contamination of Topsoil Pile A, the Division recommends that this topsoil pile be relocated to the vicinity of Topsoil Pile E. Reclamation techniques used on the reconstructed topsoil pile should include gouging, mulching, seeding, and netting. Rainfall patterns at the site (Table III-1 page 31 of the MRP) indicate that seeding could be accomplished between the months of August through February. The Division would appreciate being notified prior to seeding of this pile.

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The information available to date on the suitability of the spoil as a topsoil substitute suggests that spoil plot B is the most suitable substitute topsoil. (This is a 1,600 square foot area.) The Division will not rule out the use of the other spoil locations as supplemental cover material, but at this time the Division will require that prior to the 0.92 acre expansion the soils are salvaged from zero to twenty-four inches as topsoil, and the remaining thirty inches of subsoil is salvaged and stockpiled separately for use as substitute topsoil during final reclamation.

#### **Findings:**

The information provided does not meet the minimum requirements for Coal Processing Plants Not Located Within the Permit Area of a Mine. Prior to approval, the Permittee must provide the following, in accordance with:

**R645-302-263 and R645-301-231.400**, The submittal should include a revision of the text and plates where topsoil stockpiles are described including cross-sections of the topsoil piles as constructed (Plate 13) and Chapter IV page 80, page 80A, and 80B.

**R645-302-263 and R645-301-232.500**, (1) The application should indicate that subsoil from twenty four to fifty four inches below the surface will be separately salvaged and stockpiled for use as substitute topsoil during final reclamation. (2) If further information is available concerning the evaluation of the spoil test plots from the 1993 Annual Report, please provide said information to the Division by including it in Appendix N of the MRP.

**R645-302-263 and R645-301-234.220**, Topsoil Pile A should be relocated to the vicinity of Topsoil Pile E to avoid contamination by fugitive dust from the coal stockpiles located to the northwest.

**R645-302-263 and R645-301-331**, Please verify whether the disturbed areas where topsoil was removed were drill seeded with the mixture specified on page 88.